

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Illinois Policy Institute and the Technology &
Manufacturing Association,

Plaintiffs,

v.

Jane R. Flanagan, in her official capacity as
Director of the Illinois Department of Labor,

Defendant.

Case No. 1:24-cv-06976

Hon. Franklin U. Valderrama

**DEFENDANT’S AGREED MOTION FOR EXTENSION OF TIME
AND TO SET BRIEFING SCHEDULE**

Defendant Jane R. Flanagan, in her official capacity as Director of the Illinois Department of Labor, respectfully moves the Court (a) for an extension of time in which to answer or otherwise respond to the complaint and (b) to set a briefing schedule on Plaintiffs’ motion for a preliminary injunction and any motion Defendant files under Rule 12(b). Plaintiffs agree to the relief sought in this motion. In support of the motion, Defendant states:

1. Plaintiff Illinois Policy Institute (“IPI”) filed its initial complaint in this case on August 8, 2024. ECF 1. On October 30, 2024, IPI filed an amended complaint joining a second plaintiff, the Technology & Manufacturing Association, ECF 8, and plaintiffs together filed motion for a preliminary injunction. ECF 9.

2. Plaintiffs served the complaint and motion on Defendant on November 19, 2024. ECF 12. Defendant’s current deadline to answer or otherwise respond to the complaint is December 10, 2024. Fed. R. Civ. P. 12(a)(1)(A)(i). The Court can extend the deadline to answer or otherwise respond for good cause. Fed. R. Civ. P. 6(b)(1)(A).

3. Good cause exists to extend Defendant’s deadline to answer or otherwise respond to the complaint and to establish a schedule for briefing plaintiffs’ preliminary injunction motion.

This case raises complex questions of law, and the three-week period for a response set out in Rule 12 included the Thanksgiving holiday. A brief extension of the answer deadline, and a coordinated schedule for briefing plaintiffs' preliminary-injunction motion, would aid the efficient handling of this matter and permit the parties to provide the Court with thorough briefing.

4. The parties have conferred and agreed on the following schedule:

- Defendant will answer or otherwise respond to the complaint and respond to plaintiffs' motion for a preliminary injunction on or before Tuesday, December 24.
- Plaintiffs will file any reply in support of their motion for a preliminary injunction and a response to any motion that Defendant files under Rule 12(b) on or before Wednesday, January 8.
- Defendant will file any reply in support of any motion that she files under Rule 12(b) on or before Wednesday, January 22.

5. For these reasons, Defendant respectfully requests that the Court extend the time in which to answer or otherwise respond to the complaint to Tuesday, December 24, and that it enter the foregoing briefing schedule on Plaintiffs' motion for a preliminary injunction and any motion Defendant files under Rule 12(b).

Dated: December 6, 2024

Alex Hemmer
R. Henry Weaver
Office of the Illinois Attorney General
115 S. LaSalle St.
Chicago, IL 60603
alex.hemmer@ilag.gov
(312) 814-3000

Respectfully submitted,

KWAME RAOUL,
Attorney General of Illinois, on behalf of
Defendant Jane R. Flanagan

By: /s/ Alex Hemmer
Deputy Solicitor General